

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 KAREN B. CHAPPELLE
Supervising Deputy Attorney General
3 RENE JUDKIEWICZ, State Bar No. 141773
Deputy Attorney General
4 300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
5 Telephone: (213) 897-2537
Facsimile: (213) 897-2804

6 Attorneys for Complainant

7
8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 2009-135

11 JOEL JARENO LEUS
12 6958 Plumrose Street
Fontana, CA 92336
13 Registered Nursing License No. 610360

A C C U S A T I O N

14 Respondent.

15
16 Complainant alleges:

17 PARTIES

18 1. Ruth Ann Terry, M.P.H., R.N. (Complainant) brings this Accusation
19 solely in her official capacity as the Executive Officer of the Board of Registered Nursing
20 (Board), Department of Consumer Affairs.

21 2. On or about December 9, 2002, the Board issued Registered Nursing
22 License Number 610360 to Joel Jareno Leus (Respondent). The Registered Nursing License was
23 in full force and effect at all times relevant to the charges brought herein and will expire on
24 January 31, 2010, unless renewed.

25 JURISDICTION

26 3. This Accusation is brought before the Board under the authority of the
27 following laws. All section references are to the Business and Professions Code unless otherwise
28 indicated.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

2
3
4
5

6
7
8

90

- 1
- 2
- 3

4
5
6
7

9

20

21
22
23

24
25
26
27
28

1 child, in violation of California Penal Code section 288a.

2 b. The federal criminal complaint against Respondent was based on an
3 affidavit by Federal Bureau of Investigation (FBI) Special Agent Timothy Alon's affidavit. FBI
4 Special Agent Alon stated that on or about May 2, 2008, in an Internet Relay Chat channel called
5 "#0!!!!!!!!!!pedomoms," he posed in an undercover capacity as the mother of a 5-year-old
6 daughter and a 9-year-old daughter.

7 c. From on or about May 2 through on or about June 18, 2008, through the
8 Internet chat room, e-mail and by telephone, with a female Los Angeles Police Department
9 detective speaking on the telephone, Respondent communicated his interest in meeting with the
10 mother for the purpose of arranging a sexual encounter with the minors.

11 d. On or about June 11, 2008, the detective met with Respondent.

12 e. Eventually a meeting at a hotel was arranged for on or about June 19,
13 2008. Respondent arrived at the hotel, where he was arrested. At the time of his arrest,
14 Respondent had a laptop computer, a cellular telephone, children's toys, lubricant and a
15 children's enema. Following his arrest, Respondent said he planned on using the laptop
16 computer to show the minors pornography, and that he used the Internet to look at adult and child
17 pornography.

18
19 PRAYER

20 WHEREFORE, Complainant requests that a hearing be held on the matters herein
21 alleged, and that following the hearing, the Board issue a decision:

22 1. Revoking or suspending Registered Nursing License Number 610360,
23 issued to Joel Jareno Leus;

24 2. Ordering Joel Jareno Leus to pay the Board the reasonable costs of the
25 investigation and enforcement of this case, pursuant to Code section 125.3; and

26 ///


27 ///

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3. Taking such other and further action as deemed necessary and proper.

DATED: 12/8/08


RUTH ANN TERRY, M.P.H., R.N.
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

LA2008601175
~0563425.wpd